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FOREIGN-TRADE ZONES BOARD

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OFFICE OF THE
EXECUTIVE SECRETARY

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August 28, 2009

Mr. Andrew McGilvray
Executive Secretary
Foreign-Trade Zones Board
U.S. Department of Commerce
Room 2111
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Re: Intent to Participate in Hearing and Summary of Remarks; Docket Nos. 20-2009 and 22-2009; Foreign-Trade Zones 29 and 203; Applications for Subzone Authority; Dow Corning Corporation and REC Silicon

Dear Mr. Secretary:

Pursuant to the Notice of Public Hearing published by the Foreign-Trade Zones Board (the "Board") on July 7, 2009,¹ we hereby advise the Board that Globe Metallurgical Inc. ("Globe"), a domestic producer of silicon metal that would be directly affected by the proposed subzone manufacturing activity, intends to participate in the hearing on the above-referenced applications.

The remarks to be presented by Globe will address the following subjects:

- the fundamental policy issues raised by these applications, which are intended to enable Dow Corning and REC Silicon to obtain access to unfairly traded silicon metal imports without paying antidumping duties;
- Globe's domestic silicon metal operations and investments;
- how Globe's domestic operations would be adversely affected if the applicants' requests that their production facilities be designated as manufacturing subzones were granted;

¹ *Foreign-Trade Zones 29 and 203 Applications for Subzone Authority Dow Corning Corporation and REC Silicon; Notice of Public Hearing and Extension of Comment Period*, 74 Fed. Reg. 32,112 (July 7, 2009).

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- respects in which the applications contain statements that are inaccurate or incomplete, fail to meet the Board's criteria, and fail to demonstrate that approval of the applications would be in the public interest.

Very truly yours,



William D. Kramer
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Counsel for Globe Metallurgical Inc.

cc: Elizabeth Whiteman